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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/5/18

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RONALD BETHUNE, on behalf of himself and  
all others similarly situated,

Plaintiff,

-against-

LENDINGCLUB CORPORATION,  
WEBBANK, STEEL PARTNERS  
HOLDINGS, L.P., THE LENDING CLUB  
MEMBERS TRUST, and DOES 1 through  
10, inclusive,

Defendants.

Case No. 1:16-cv-02578 (NRB)

**STIPULATION AND PROPOSED**  
**ORDER OF DISMISSAL WITH**  
**PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff Ronald Bethune, by and through his attorneys, and Defendants LendingClub Corporation, WebBank, Steel Partners Holdings, L.P., and The Lending Club Members Trust, by and through their attorneys, hereby jointly move for an order dismissing with prejudice all claims against all Defendants in the above-captioned action, with each party to bear its own costs, expenses, and attorneys' fees.

SO ORDERED this 5<sup>th</sup> day of March, 2018.

*Samuel R. DeChurro*  
USDC